

The **WALT DISNEY** Company

International  
Labor Standards



# Submission Requirements



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# INTRODUCTION

This supplement to The Walt Disney Company International Labor Standards (“ILS”) Program Manual details the country-specific submission requirements to obtain and maintain Facility and Merchandise Authorization (“FAMA”) for each Facility manufacturing Disney-branded products. This supplement contains a list of countries<sup>1</sup>/regions in which Disney-branded products may be manufactured, as well as where raw materials and components may be sourced. It also specifies what documentation must be provided to Disney based on the location of the Facility.

Disney uses the World Bank’s Worldwide Governance Indicators (“WGI”) as a primary resource to establish policies relating to where production will be permitted and ILS Audit requirements. The **Permitted Sourcing Countries (PSC) policy** includes countries/regions that achieve a requisite ranking under the WGI, as well as certain countries/regions where Better Work operates a program. Disney also uses WGI rankings to help determine Disney’s requirements for submission of ILS Audit Reports for Facilities. The **PSC policy** is subject to change.

## OBTAINING AND RETAINING AUTHORIZATION

Consult the information below (based on the **PSC policy**) to ensure Disney allows sourcing from the country in which the facility is located. The information below will also help determine initial requirements, such as whether submission of an ILS Audit report is required and any additional required documentation. For details on what constitutes a qualified ILS Audit please consult the **ILS Program Manual**. Before beginning Disney-branded production, you must declare to, and receive written authorization from, Disney for each Facility you intend to use in the production of Disney-branded products.

## PERMITTED SOURCING COUNTRIES (PSC)

Facilities must be located in a PSC to be used in the production of Disney-branded products. Raw materials and components must also be sourced only from PSC. Requirements vary by country and are described below.

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<sup>1</sup> For simplicity, the term “countries” refers to countries, special administrative regions, or economically independent jurisdictions

## PERMITTED – NO AUDIT REQUIRED

To obtain authorization to use Facilities in the countries/regions listed below, you must submit a FAMA application for each Facility you intend to use in the production of Disney-branded products. To maintain authorization, submit a new FAMA application annually.

PERMITTED WITHOUT ILS AUDITS			
American Samoa	Croatia	Latvia	Samoa
Andorra	Cyprus	Liechtenstein	San Marino
Anguilla	Czech Republic	Lithuania	Seychelles
Antigua and Barbuda	Denmark	Luxembourg	Singapore
Aruba	Dominica	Macau SAR	Slovak Republic
Australia	Estonia	Malta	Slovenia
Austria	Finland	Marshall Islands	South Korea
Bahamas	France	Martinique	Spain
Barbados	French Guiana	Mauritius	St. Kitts and Nevis
Belgium	Germany	Micronesia, Fed. Sts.	St. Lucia
Bermuda	Greenland	Monaco	St. Vincent and The Grenadines
Bhutan	Grenada	Netherlands	Sweden
Botswana	Guam	New Zealand	Switzerland
Brunei Darussalam	Hong Kong SAR	Niue	Taiwan
Canada	Iceland	Norway	Tuvalu
Cape Verde	Ireland	Palau	United Arab Emirates
Cayman Islands	Israel	Poland	United Kingdom
Channel Islands*	Italy	Portugal	United States
Chile	Japan	Qatar	Uruguay
Costa Rica	Kirbati	Réunion	Virgin Islands (U.S.)

\* Islands include Jersey, Guernsey, Alderney, Sark and Herm.

## PERMITTED – AUDIT REQUIRED

To obtain authorization to use Facilities in the countries/regions listed below, determine whether the Facility is located in a country with additional conditions as described further below. If additional conditions do not apply, submit a FAMA application and a qualified ILS Audit for each Facility you intend to use in the production of Disney-branded products. If additional conditions apply, see the [next section](#) for more information. To maintain authorization, a qualified ILS Audit must be submitted annually or as otherwise specified by Disney. For details on what constitutes a qualified ILS Audit please consult the [ILS Program Manual](#).

### PERMITTED WITH ILS AUDITS

Albania	Ecuador	Jamaica	Nauru	Serbia	Vanuatu
Argentina	Egypt, Arab Rep. <sup>3</sup>	Jordan <sup>2</sup>	Nicaragua <sup>4</sup>	Sierra Leone	Vietnam <sup>3</sup>
Armenia	El Salvador	Kazakhstan	Niger	Solomon Islands	West Bank and Gaza
Azerbaijan	Eswatini	Kenya	North Macedonia	South Africa	Zambia
Bahrain	Ethiopia <sup>4</sup>	Kosovo	Oman	Sri Lanka	
Bangladesh <sup>1</sup>	Fiji	Kuwait	Pakistan <sup>4</sup>	Suriname	
Belize	Gambia	Lao PDR	Panama	Tanzania	
Benin	Georgia	Lesotho	Papua New Guinea	Thailand	
Bolivia	Ghana	Malawi	Paraguay	Timor-Leste	
Bosnia and Herzegovina	Greece	Malaysia	Peru	Togo	
Brazil	Guatemala	Maldives	Philippines	Tonga	
Bulgaria	Guyana	Mexico	Puerto Rico	Trinidad and Tobago	
Burkina Faso	Haiti <sup>4</sup>	Moldova	Romania	Tunisia	
Cambodia <sup>2</sup>	Honduras	Mongolia	Rwanda	Turkey	
China	Hungary	Montenegro	São Tomé and Príncipe	Uganda	
Colombia	India	Morocco	Saudi Arabia	Ukraine	
Dominican Republic	Indonesia <sup>3</sup>	Namibia	Senegal	Uzbekistan <sup>4</sup>	

1 Facilities must participate in the Better Work program, a Better Work assessment must be shared with Disney. Facilities are also required to participate in a safety program/initiative acceptable to Disney. A licensee/vendor applying for authorization of a Facility must be a member or signatory of the organization operating the chosen program/initiative.

2 For facilities that are legally mandated to participate in the Better Work program, a Better Work assessment must be shared with Disney. For Facilities that are not legally mandated to participate in the Better Work program, Disney will accept other assessments/audits as described in Disney's ILS Program Manual.

3 For Facilities that participate in the Better Work program, a Better Work assessment must be shared with Disney. For Facilities that do not participate in the Better Work program, Disney will accept other assessments/audits as described in Disney's ILS Program Manual.

4 Only produce in and source from Facilities in the Better Work program. A Better Work assessment must be shared with Disney

## PERMITTED – AUDIT REQUIRED + ADDITIONAL CONDITIONS

In certain PSC, Disney may require that Facilities engaged in Disney-branded production participate in the Better Work program. This requirement currently applies: (1) to all Facilities in Bangladesh, Ethiopia, Haiti, Nicaragua, Pakistan and Uzbekistan, and (2) to Facilities in Cambodia and Jordan that are legally mandated to participate in the Better Work program. A Better Work assessment must be shared with Disney for those Facilities.

For other countries/regions in which Better Work operates, Disney strongly encourages participation in the Better Work program. For Facilities participating in the Better Work Program, a Better Work assessment must be shared with Disney, other audit types will not be accepted. This currently applies to Facilities in: (1) Egypt, Indonesia and Vietnam, and (2) Facilities in Cambodia and Jordan that are not legally mandated to participate in the Better Work program.

Instructions on how to share a Better Work assessment can be found in the [Appendix](#).

### EGYPT, INDONESIA AND VIETNAM

If Facilities in these countries participate in the Better Work program, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. To maintain authorization, the Better Work assessment should be shared annually as specified by Disney.

If the Facility does not participate in the Better Work program, follow the general instructions in the [Permitted – Audit Required](#) section above.

### ETHIOPIA, HAITI, NICARAGUA, PAKISTAN AND UZBEKISTAN

To request a FAMA for Facilities in these countries, submit a FAMA application for each Facility and share the most recent Better Work assessment for each Facility you intend to use. To maintain authorization, share a new Better Work assessment annually or as specified by Disney.

### CAMBODIA: GARMENTS AND TRAVEL ACCESSORIES

Facilities that manufacture garments and/or travel accessories for export are required by Cambodian law to participate in Better Work. To request a FAMA, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. In addition, the Facility must be enrolled in Better Work's Advisory Services program. To maintain authorization, share a new Better Work assessment annually or as specified by Disney.

### CAMBODIA: ALL OTHER FACILITIES

If the Facility participates in the Better Work program, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. In addition, the Facility must be enrolled in Better Work's Advisory Services program. To retain authorization, share a new Better Work assessment annually or as specified by Disney.

If the Facility does not participate in the Better Work program, follow the general instructions in the [Permitted – Audit Required](#) section above.

## **FACILITIES IN JORDAN: EXPORTING TO USA, ISRAEL AND EU MARKETS**

Facilities that export to EU markets under the simplification of Rules of Origin or export to the USA or Israel, are required by Jordanian law to participate in Better Work. To obtain authorization, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. To retain authorization, share a new Better Work assessment annually or as specified by Disney.

## **FACILITIES IN JORDAN: ALL OTHER FACILITIES**

If the Facility participates in the Better Work program, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. To maintain authorization, the Better Work assessment should be shared annually or as specified by Disney.

If the Facility does not participate in the Better Work program, follow the general instructions in the [Permitted – Audit Required](#) section above.

## **FACILITIES IN BANGLADESH: BETTER WORK**

Disney requires Better Work participation for Facilities in Bangladesh. To obtain authorization, submit a FAMA application and share the most recent Better Work assessment for each Facility you intend to use. To retain authorization, share a new Better Work assessment annually or upon request.

## **STRUCTURAL, FIRE AND ELECTRICAL SAFETY**

Disney requires Facilities in Bangladesh to participate in one of the two safety programs listed below, and your company must be a member or signatory of, the organization operating the chosen program. Links for these safety organizations can be found in the [Appendix](#). To obtain Facility authorization, follow the steps below for the applicable safety program. To retain authorization, submit new safety evidence as specified by Disney.

### ***SUBMITTING NIRAPON SAFETY INFORMATION***

- Submit evidence of your company's Nirapon membership .
- Submit Facility safety evidence which covers all Facility buildings, including additions, extensions and expansions.
- Disney accepts the following Nirapon Factory Statuses:
  - CAP Closed + Safety Management Program (SMP)
  - CAP Closed + SMP + Expansion/Extension 1, 2, 3, etc.
- Provide the “Active Factory Designations” and “Completed Reports [current year]” reports exported from the Nirapon platform upon request. Contact Nirapon for instructions on how to access these reports.

### ***SUBMITTING RSC SAFETY INFORMATION***

- Submit evidence of your company's RSC signatory status.
- Submit Facility safety evidence which covers all Facility buildings, including additions, extensions and expansions that meets all of the following criteria:
  - o Remediation status must be “On Track” or “Initial CAP Completed”
  - o Progress rate must be 100%
- All buildings at the Facility must meet these criteria.
- All other remediation statuses and progress rates used by the RSC are considered noncompliant for purposes of the ILS Program.

# APPENDIX

## BETTER WORK ASSESSMENT-SHARING INSTRUCTIONS

Better Work buyers can share assessments with direct supply chain partners provided they are in the same direct supply chain and the assessment cycle has been unlocked by their organization.

Complete the following steps in the [Better Work Star Portal](#):

- Step 1: Add each Facility you intend to use for Disney-branded production to your factory list.
- Step 2: Name Disney in your supply chain for each Facility you added to your factory list.
- Step 3: Request Third Party Access (TPA) for each facility that you are sharing assessments with Disney, so those Facilities can grant Disney TPA.
- Step 4: Unlock the most recent assessment cycle to share with Disney.

This information is current as of the date of publication of this Supplement. For additional help with the Better Work portal, please contact Better Work.

## RELEVANT LINKS:

[BETTER WORK](#)

[PERMITTED SOURCING COUNTRIES POLICY](#)

[BETTER WORK STAR PORTAL](#)

[NIRAPON](#)

[ILS PROGRAM MANUAL](#)

[RSC | RMG SUSTAINABILITY COUNCIL](#)